

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**IN RE: TAASERA LICENSING LLC, PATENT
LITIGATION**

**THIS DOCUMENT RELATES TO ALL
CASES**

Civil Action No. 2:22-md-03042-JRG

**JOINT MOTION FOR EXTENSION OF TIME TO SERVE INITIAL AND
ADDITIONAL DISCLOSURES AND FILE PROPOSED PROTECTIVE ORDER**

Taasera Licensing LLC (“Taasera”), Quest Patent Research Corporation (“Quest”), Palo Alto Networks Inc. (“Palo Alto”), Check Point Software Technologies, Ltd. (“Check Point”), Trend Micro Incorporated (“Trend Micro Japan”), Trend Micro, Inc. (“Trend Micro US”), CrowdStrike, Inc. and CrowdStrike Holdings, Inc. (collectively, “CrowdStrike”), Fortinet, Inc. (“Fortinet”), and Musarubra US LLC d/b/a Trellox (“Trellox”) respectfully request an extension of time as follows:

I.

The current deadline for the Parties to serve their Initial and Additional Disclosures and to file a Proposed Protective Order is February 7, 2023.

II.

The parties have conferred and agree to a short one-week extension for the deadlines indicated above. The deadlines for the Parties to serve their Initial and Additional Disclosures and to file a Proposed Protective Order would be extended from February 7, 2023 up to and including February 14, 2023.

Current Deadline	New Deadline	Description
February 7, 2023	February 14, 2023	File Proposed Protective Order
February 7, 2023	February 14, 2023	Serve Initial and Additional Disclosures

III.

The Parties have been diligently investigating their claims and defenses in the above-captioned case and continue to investigate the identity of individuals and businesses likely to have knowledge of relevant facts. The short-requested extension will allow the Parties additional time to conduct their investigations for purposes of their Initial and Additional Disclosures. In addition, the Parties continue to actively negotiate the provisions of the Proposed Protective Order in hopes of resolving all differences and/or narrowing any issues for the Court. With the additional time requested, the Parties may be able to resolve their remaining disagreements. These extensions should not affect any other aspect of the current schedule.

Dated: February 3, 2023

Respectfully Submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on February 3, 2023, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ G. Blake Thompson
G. Blake Thompson

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel of record have met and conferred in accordance with Local Rule CV-7(h) and are in agreement as to this Motion.

/s/ G. Blake Thompson
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